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STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ANDREW M. CUOMO
Attorney General

DIVISION OF STATE COUNSEL
Litigation Bureau

August 11, 2008

VIA HAND DELIVERY

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl St., Room 640
New York, NY 10007

Re: Robert Jones v. Officer A. Harris, et al.
08-CV-04003 (CM)

Extension granted
Allen Wen Mol

Dear Judge McMahon:

I am an Assistant Attorney General in the office of Andrew M. Cuomo, Attorney General of the State of New York, counsel for defendants Superintendent Luis R. Marshall and Correction Officer Ashley Harris, in the above-referenced 42 U.S.C. § 1983 amended complaint. Although no acknowledgments of service have been filed yet, defendant Marshall was served on August 1, 2008, setting his deadline to respond for August 21, 2008. At this time, Correction Officer R. Allen is the only defendant who has not yet been served, but counsel for defendants will likely represent all named defendants eventually served. Because I have only recently been assigned this case, and have yet to receive any of the records, on behalf of the served defendants, I respectfully request a sixty-day extension of time to respond to the complaint until October 20, 2008, to allow the plaintiff time for completion of service, for my receipt of the records, and for discussions with my clients. This is my first request for an extension, and I have not contacted the plaintiff concerning this request because he is proceeding *pro se* and is incarcerated.

Respectfully submitted,

Frederick H. Wen

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cc : Robert Jones
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